

Exhibit A

From: [Castillón, Jesús J.](#)
To: [Jeffrey Bernfeld \(jbdobro@hotmail.com\)](#); [David Bernfeld \(dbblaw@hotmail.com\)](#) ([dbblaw@hotmail.com](#))
Cc: [Hunt, Dean D.](#); [Hochmuth, Farrell](#)
Subject: Bernfeld, DeMatteo & Bernfeld: Action Items
Date: Monday, May 09, 2016 1:48:34 PM
Attachments: [image002.jpg](#)
[image004.jpg](#)
[image006.jpg](#)
[image008.jpg](#)
[image010.jpg](#)
[Bernfeld.zip](#)

Jeff, David:

Thank you for your time this afternoon. As discussed, please see a recap of the list of action items and their due dates below.

10-04408 (Cheryl Yankowitz, et al.)

- Jack Yankowitz's responses to the Trustee's Requests for Admission: COB Wednesday, May 11, 2016. As we have discussed, we consider the requests deemed admitted since they are overdue.
- Defendants' production of documents in response to the Trustee's Requests for Production by May 20, 2016 (if not before). Any objections to the responses have been waived because the responses are overdue.
- Dates for Cheryl and Jack Yankowitz's depositions: next few days, but no later than Friday, May 13, 2016.

-

10-04717 (Estate of William Diamond, et al.)

- Jeff to call counsel for the Estate of William Diamond twice a day this week to arrange signature to retainer agreement, if not withdraw.
- Initial disclosures to be served on the Trustee immediately following execution of parties' retainer agreement.

10-05094 (Estate of Carolyn Miller, et al.)

- Jeff to refile answer on behalf of all defendants following discussion with counsel for the Estate of Leonard Miller. Call to occur this week.
- Jeff and David to produce financial information including inventories for both Estates, Form 706 for both Estates, accounting of the Carolyn Miller Revocable Trust (including all distributions from 2006 to the present), information regarding the home that was sold and owned by the Estate of Carolyn Miller and Leonard Miller, and the amount of estate taxes paid and information regarding any refunds sought and/or received for payment of estate taxes: May 20, 2016 (if not before).

10-04884 (Steven Andelman)

- Initial Disclosures: May 16, 2016

10-04916 (Susan Andelman)

- Initial Disclosures: May 16, 2016

- Jeff to call Court this week to check on status of Motion to Vacate Default.

Non-disclosure agreements and consents to be bound:

- Jeff to execute enclosed copies of non-disclosure agreements and consents to be bound this week.
- Jeff to look into notice of appearance with regard 10-04394 (Frederic Z. Konigsberg, et al.)

Next status conference: Tuesday, May 17, 2016 at 1:00 p.m. CST/2:00 p.m. EST.

Jesús J. Castillón

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From: [Castillón, Jesús J.](#)
To: [Jeffrey Bernfeld \(jbdobro@hotmail.com\)](#); [David Bernfeld \(dbblaw@hotmail.com\)](#) ([dbblaw@hotmail.com](#))
Cc: [Hunt, Dean D.](#); [Hochmuth, Farrell](#); [Smith, Rachel M.](#)
Subject: RE: Bernfeld, DeMatteo & Bernfeld: Action Items
Date: Tuesday, May 17, 2016 4:32:58 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)

Jeff, David:

In follow-up to our discussion earlier today, please see the updated list of action items below.

10-04408 (Cheryl Yankowitz, et al.)

- Jack Yankowitz's responses to the Trustee's Requests for Admission: COB Wednesday, May 11, 2016. As we have discussed, we consider the requests deemed admitted since they are overdue.
 - Received, May 11, 2016.
- Defendants' production of documents in response to the Trustee's Requests for Production by May 20, 2016 (if not before). Any objections to the responses have been waived because the responses are overdue.
 - David to confirm status of production on May 18, 2016 and provide follow-up.
- Dates for Cheryl and Jack Yankowitz's depositions: next few days, but no later than Friday, May 13, 2016.
 - Pending receipt (and review) of defendants' documents.
- Counsel will agree to a reasonable extension of the case management deadlines, to be discussed after receipt of defendants' documents

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10-04717 (Estate of William Diamond, et al.)

- Jeff to call counsel for the Estate of William Diamond twice a day this week to arrange signature to retainer agreement, if not withdraw.
 - Stipulation for substitution can be filed; Farrell has emailed Jeff for confirmation.
- Initial disclosures to be served on the Trustee immediately following execution of parties' retainer agreement.
 - Jeff expects to have retainer agreement signed ASAP.
 - May 27, 2016.

10-05094 (Estate of Carolyn Miller, et al.)

- Jeff to refile answer on behalf of all defendants following discussion with counsel for the Estate of Leonard Miller. Call to occur this week.
 - Counsel for the Estate has changed. Jeff has called and left a voice message for new counsel. Expects to find out shortly on whether he can proceed to file the answer on behalf of all of the defendants.
- Jeff and David to produce financial information including inventories for both Estates, Form 706 for both Estates, accounting of the Carolyn Miller Revocable Trust (including all distributions from 2006 to the present), information regarding the home that was sold and

owned by the Estate of Carolyn Miller and Leonard Miller, and the amount of estate taxes paid and information regarding any refunds sought and/or received for payment of estate taxes: May 20, 2016 (if not before).

10-04884 (Steven Andelman)

- Initial Disclosures: May 16, 2016
 - Anticipated May 20, 2016 or at the latest May 27, 2016.

10-04916 (Susan Andelman)

- Initial Disclosures: May 16, 2016
- Jeff to call Court this week to check on status of Motion to Vacate Default.
 - Anticipated May 20, 2016 or at the latest May 27, 2016.

Non-disclosure agreements and consents to be bound:

- Jeff to execute enclosed copies of non-disclosure agreements and consents to be bound this week.
 - Jeff to sign and send back signed non-disclosure agreements and consents to be bound today, May 17, 2016.
- Jeff to look into notice of appearance with regard 10-04394 (Frederic Z. Konigsberg, et al.)

Next status conference: Wednesday, June 1, 2016 at 1:00 p.m. CST/2:00 p.m. EST.

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From: Castillón, Jesús J.
Sent: Monday, May 09, 2016 1:48 PM
To: Jeffrey Bernfeld (jbdobro@hotmail.com); David Bernfeld (dbblaw@hotmail.com) (dbblaw@hotmail.com)
Cc: Hunt, Dean D.; Hochmuth, Farrell
Subject: Bernfeld, DeMatteo & Bernfeld: Action Items

Jeff, David:

Thank you for your time this afternoon. As discussed, please see a recap of the list of action items and their due dates below.

10-04408 (Cheryl Yankowitz, et al.)

- Jack Yankowitz's responses to the Trustee's Requests for Admission: COB Wednesday, May 11, 2016. As we have discussed, we consider the requests deemed admitted since they are overdue.
- Defendants' production of documents in response to the Trustee's Requests for Production by May 20, 2016 (if not before). Any objections to the responses have been waived because the responses are overdue.

- Dates for Cheryl and Jack Yankowitz's depositions: next few days, but no later than Friday, May 13, 2016.

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10-04717 (Estate of William Diamond, et al.)

- Jeff to call counsel for the Estate of William Diamond twice a day this week to arrange signature to retainer agreement, if not withdraw.
- Initial disclosures to be served on the Trustee immediately following execution of parties' retainer agreement.

10-05094 (Estate of Carolyn Miller, et al.)

- Jeff to refile answer on behalf of all defendants following discussion with counsel for the Estate of Leonard Miller. Call to occur this week.
- Jeff and David to produce financial information including inventories for both Estates, Form 706 for both Estates, accounting of the Carolyn Miller Revocable Trust (including all distributions from 2006 to the present), information regarding the home that was sold and owned by the Estate of Carolyn Miller and Leonard Miller, and the amount of estate taxes paid and information regarding any refunds sought and/or received for payment of estate taxes: May 20, 2016 (if not before).

10-04884 (Steven Andelman)

- Initial Disclosures: May 16, 2016

10-04916 (Susan Andelman)

- Initial Disclosures: May 16, 2016
- Jeff to call Court this week to check on status of Motion to Vacate Default.

Non-disclosure agreements and consents to be bound:

- Jeff to execute enclosed copies of non-disclosure agreements and consents to be bound this week.
- Jeff to look into notice of appearance with regard 10-04394 (Frederic Z. Konigsberg, et al.)

Next status conference: Tuesday, May 17, 2016 at 1:00 p.m. CST/2:00 p.m. EST.

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["Imbruno719@gmail.com"](#)
Cc: [Hunt, Dean D.](#); [Hochmuth, Farrell](#)
Subject: Discovery Deficiencies
Date: Wednesday, August 24, 2016 5:12:33 PM
Attachments: [image002.jpg](#)
[image004.jpg](#)
[image006.jpg](#)
[image008.jpg](#)
[image010.jpg](#)

Dear Counsel:

Under Judge Bernstein's Chambers Rules and Rule 7007-1 of the Local Rules of the United States Bankruptcy Court, this letter is a final attempt to resolve your clients' ongoing failure to respond to the following discovery requests:

10-04408 (Cheryl Yankowitz, et al.)

- Amended and Supplemental Responses to First Set of Requests for Admission, Production of Documents and Things and Interrogatories: Due on August 5, 2016.

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10-04717 (Estate of William Diamond, et al.)

- Initial Disclosures: Due on December 18, 2015.
- First Set of Requests for Admission: Due on August 1, 2016.
- First Set of Requests for Production of Documents and Things: Due on August 1, 2016.

10-04884 (Steven Andelman)

- Initial Disclosures: Due on December 18, 2015.
- First Set of Requests for Admission: Due on August 8, 2016.
- First Set of Requests for Production of Documents and Things: Due on August 8, 2016.

10-04916 (Susan Andelman)

- Initial Disclosures: Due on February 19, 2016.
- First Set of Requests for Admission: Due on August 8, 2016.
- First Set of Requests for Production of Documents and Things: Due on August 8, 2016.

10-05094 (Estate of Carolyn Miller, et al.)

- First Set of Requests for Production of Documents and Things: Due on August 15, 2016.

We are also renewing our request for deposition dates in Yankowitz. To date, Defendants have yet to produce documents in response to the Trustee's Requests for Production of Documents and Things. We need all responsive documents produced prior to the depositions. Please therefore, produce Defendants' document production along with the other requested supplementation by Tuesday, August 30. If we do not receive the entirety of the discovery (and its supplementation) as described above by **Tuesday, August 30**, we will file a letter requesting Judge Bernstein set this matter for a discovery conference.

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